

Northern California Law Group, PC.
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Attorney for Claimant
Jane Elizabeth Tyler

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re) Case No. 19-30088-DM
)
PG&E Corporation,) Chapter 11
) Lead Case, Jointly Administered
and)
) DECLARATION OF JOSEPH FEIST IN
PACIFIC GAS AND ELECTRIC) SUPPORT OF MOTION PURSUANT TO
COMPANY,) FED. R. BANKR. PROC. 7015 AND 7017 TO
) ENLARGE TIME TO FILE PROOF OF
Debtors.) CLAIM PURSUANT TO FED. R. BANKR.
) PROC. 9006(b)(1)
[x] Affects both Debtors)
)
*All paper shall be filed in the Lead Case,) Date: December 3, 2021
No. 19-30088-DM) Time: 10:30 a.m. (Pacific Time)
) Place: Telephonic/Video Appearances Only
) United States Bankruptcy Court
) Courtroom 17,
) 450 Golden Gate Ave., 16 th Floor
) San Francisco, CA
) Judge: Hon. Dennis Montali
)
) Response Due Date: November 19, 2021

I, Joseph K. Feist, hereby declare:

1. I am an attorney at law duly licensed to practice before all state and federal courts of the State of California.
2. My firm represents wildfire victims who sustained losses from the Camp Fire in 2018.

- 1 3. I represent Edward Delongfield, Mrs. Tyler's ex-husband, as a creditor in the PG&E bankruptcy
2 and through the Fire Victim Trust process.
- 3 4. On August 27th, 2021, the Fire Victims Trust provided Mr. Delongfield a determination where
4 they awarded him only 50% of his personal property and additional living expenses due to Mrs.
5 Tyler still having a 50% interest in the property on the day of the fire.
- 6 5. On October 15th, 2021, the Fire Victims Trust informed me that Mr. Delongfield will not be able
7 to be fully compensated for his losses, including his personal property and additional living
8 expenses damages because he only had a 50% interest in the loss location on the day of the fire.
- 9 6. Our office contacted Mrs. Tyler, explained the issues Mr. Delongfield is currently facing and she
10 expressed a desire to move forward with the current motion and the intention that any recovery
11 will be provided to Mr. Delongfield so he may be made whole.
- 12 7. On October 21, 2021, Movant retained Northern California Law Group, PC to file this motion,
13 file a Proof of Claim and represent her through the Fire Victims Trust process
- 14 8. All statements in this declaration are based on my own personal knowledge and observation and
15 from my review of the court and business records in this case, or upon information and belief as
16 indicated. If called to testify on this matter, I can and would competently testify to the matters set
17 forth in this Declaration.

18
19 I declare under penalty of perjury pursuant to the laws of the United States of America that the
20 foregoing is true and correct.

21 Executed this 21st day of October 2021, in Sacramento, California.

22
23 /s/ Joseph Feist

24 Joseph K. Feist, Attorney for Movant